IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 08-

v. : DATE FILED:

STEPHEN WILLIAMS : VIOLATIONS:

DEON HOLLOWAY, 18 U.S.C. § 1951(conspiracy to commit

a/k/a "Jamal Holloway" : Hobbs Act robbery - 1 count)

18 U.S.C. § 1951 (Hobbs Act robbery - 1

count)

18 U.S.C. § 2 (aiding and abetting)

: Notice of forfeiture

INDICTMENT

COUNT ONE

(HOBBS ACT ROBBERY CONSPIRACY)

THE GRAND JURY CHARGES THAT:

- H2O Barber Shop and Salon, located at 640 N. 55th Street, in Philadelphia,
 Pennsylvania was engaged in interstate commerce.
- 2. On or about December 21, 2007, at Philadelphia, in the Eastern District of Pennsylvania, defendants

STEPHEN WILLIAMS and DEON HOLLOWAY, a/k/a "Jamal Holloway,"

conspired and agreed together, and with others known and unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, in that defendants WILLIAMS and HOLLOWAY, and others unknown to the grand jury, conspired to unlawfully take and obtain money and other items of value from the person of the barbers and customers at the H20 Barber

Shop and Salon and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their possession, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

3. It was part of this conspiracy that defendants STEPHEN WILLIAMS and DEON HOLLOWAY entered the H20 Barber Shop and Salon, each armed with a weapon, robbed two barbers and two customers, during which they threatened and assaulted the barbers and customers at gunpoint, and fled with approximately \$1,615 in cash and personal property.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants STEPHEN WILLIAMS and DEON HOLLOWAY committed the following overt acts, among others, in the Eastern District of Pennsylvania on or about December 21, 2007:

- 1. Defendants STEPHEN WILLIAMS and DEON HOLLOWAY entered the H20 Barber Shop at 640 N. 55th Street, in Philadelphia, Pennsylvania. Defendant WILLIAMS pulled out what appeared to be a black Glock semi-automatic handgun and pointed it at S.R. and I.G., while defendant HOLLOWAY pulled out a small black revolver and approached D.S. and A.J. ("the victims").
- 2. Defendants STEPHEN WILLIAMS and DEON HOLLOWAY demanded money from the victims, saying "you know what this is, you know what I want."
- 3. Defendant STEPHEN WILLIAMS questioned S.R. about movements he was making, leading defendant DEON HOLLOWAYto begin to pat down S.R. When defendant

HOLLOWAY discovered S.R.'s deputy sheriff badge from the Philadelphia Sheriff's Office in his wallet and announced, "This niggas a cop."

4. As defendants STEPHEN WILLIAMS and DEON HOLLOWAY backed out of the barber shop, defendant WILLIAMS kept his gun pointed at S.R. and toward the barber shop until he was able to flee in a green Dodge Intrepid, Pennsylvania license plate number GWZ0151.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

(HOBBS ACT ROBBERY)

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

- H2O Barber Shop and Salon, located at 640 N. 55th Street, Philadelphia,
 Pennsylvania, was engaged in interstate commerce.
- 2. On or about December 21, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

STEPHEN WILLIAMS and DEON HOLLOWAY,

a/k/a "Jamal Holloway"

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants WILLIAMS and HOLLOWAY unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$1,615 in cash and other items of value, from persons and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their persons and property in their possession, that is, by pointing at least one firearm at the barbers and customers in the barber shop and demanding money and things of value.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

NOTICE OF CRIMINAL FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1951 as set forth in this indictment, defendants

STEPHEN WILLIAMS and DEON HOLLOWAY,

a/k/a "Jamal Holloway"

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, including, but not limited to, the sum of \$1,615.

- 2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the Court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant	up to the valu	ue of the property su	bject to forfeiture.
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All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C).

A TRUE BILL:

GRAND JURY FOREPERSON

LAURIE MAGID
ACTING UNITED STATES ATTORNEY